

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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CHERYL SAGATAW,  
DEANTHONY BARNES, ROBERTA  
STRONG, and TRAVIS NELOMS *on*  
*behalf of themselves and a class of*  
*similarly-situated individuals,*

Plaintiffs,

vs.

MAYOR JACOB FREY, *in his*  
*individual and official capacity*

Defendant.

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Civil Action

Case No. 24-CV-00001 (ECT-TNL)

**SECOND DECLARATION OF  
ENRIQUE VELAZQUEZ**

Your Declarant is Enrique Velazquez, and he submits the following declaration:

1. I am the Director of Regulatory Services for the City of Minneapolis (“City”). I submit this declaration in support of the Mayor Jacob Frey’s Answer to Plaintiffs’ First Amended Complaint. The information in this declaration is based on my personal knowledge from first-hand involvement and/or information I’ve learned from City employees occurring in the normal course of my work as the Director of Regulatory Services.

2. The City has been inundated with health and safety complaints related to the four different iterations of the encampment referred to by Plaintiffs as “Camp Nenookaasi.”

EXHIBIT 1

3. There have been hundreds of 911 calls related to the various iterations of the Camp Nenookaasi ("Encampment"). These complaints include but are not limited to gun shots, assaults, human trafficking, and open-air drug use. On January 28, 2024, an individual was shot outside the Encampment by a suspect believed to be staying in the Encampment. That suspect has not yet been apprehended.

4. There have been hundreds of 311 calls and/or other complaints related to the Encampment, which include but are not limited to discarded hypodermic needles, individuals from the Encampment trespassing on neighboring properties, individuals from the Encampment urinating and defecating on neighboring properties, individuals from the Encampment sleeping on or under decks of neighboring properties, individuals from the Encampment starting fires on neighboring properties, and vandalism and theft from neighboring properties. The City has continued to receive similar complaints from neighbors about the current iteration of the Encampment.

5. Most recently, the frequent and unlawful fires at the current iteration of the Encampment have resulted in smoke entering a nearby medical clinic and are interfering with the clinic's operations, including negatively impacting its staff and potentially disrupting its capacity to complete medical tests for patients in its lab.

6. I declare under penalty of perjury that everything I have stated in this declaration is true and correct. Signed in Hennepin County, Minnesota.

Dated: 2/27/24

/s Enrique Velazquez  
Enrique Velazquez